

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE SEALED MATTER

CR. NO.

MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, moves pursuant to Rule 6 of the Federal Rules of Criminal Procedure to file the documents accompanying this Motion under seal for the reasons set forth in the accompanying sealed declaration in support of the government's motion to seal.

WHEREFORE, for the foregoing reasons, the United States moves to seal this Motion and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

MARTIN C. CARLSON
Acting United States Attorney

BY: s/Christy H. Fawcett
CHRISTY H. FAWCETT
Assistant U.S. Attorney
PA35067
Christy.Fawcett@usdoj.gov

228 Walnut Street, Suite 220
P.O. Box 11754
Harrisburg, PA 17108
Phone: (717) 221-4482
Fax: (717) 221-4493

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

CR. NO.

VS.

BENJAMIN RICHARD ECKERSON

DECLARATION IN SUPPORT OF MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, submits the following Declaration in Support of the Government's Motion to Seal, pursuant to Rule 6 of the Federal Rules of Criminal Procedure.

1. Your declarant states that, in the view of your declarant this Declaration and the following documents should be filed under seal:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Indictment | <input type="checkbox"/> Complaint |
| <input type="checkbox"/> Complaint, Arrest Warrant, and Affidavit | <input type="checkbox"/> Search Warrant, Application and Affidavit |
| <input type="checkbox"/> Plea Agreement | <input type="checkbox"/> Motion Recommending Downward Departure |

2. The United States requests that the above-referenced documents, and this Motion, remain under seal pending:

- ☒ The arrest of the Defendant(s);
- ☐ Further Order of Court;
- ☐ Written notification by the United States that these pleadings no longer need to remain filed under seal; or
- ☐ Until a return is made of the search warrant by the executing agents.

3. In support of this Motion, the United States alleges that filing these pleadings under seal is necessary in order to:

- ☐ Preserve the integrity of this ongoing case;
- ☐ Ensure the safety of investigative personnel;
- ☐ Protect the identity of potential witnesses;
- ☐ Allow for the seizure of evidence;
- ☒ Permit the arrest of those charged with violations of criminal laws; or
- ☐ Allow this defendant to complete the cooperation aspects of the plea agreement.
- ☐ Avoid unfair prejudice to the defendants

WHEREFORE, for the foregoing reasons, the United States moves to seal this Declaration and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

MARTIN C. CARLSON
Acting United States Attorney

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